

02.01.2000

**Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Amendment of Section 73.622(b))
DTV Table of Television Allotments)
(Charlotte, North Carolina))

Docket No. _____

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

SUPPLEMENT TO PETITION FOR RULE MAKING

Charlotte-Mecklenburg Public Broadcasting Authority ("Authority"), licensee of noncommercial educational Station WTVI-TV, Channel 42, Charlotte, North Carolina, through its attorneys, hereby supplements the petition for rule making which it filed on July 30, 1999 to revise the technical proposal.

1. The Authority has petitioned for amendment of Section 73.622(b), the DTV Table of Television Allotments, to substitute DTV Channel *25 for existing DTV Channel *24 at Charlotte, North Carolina as Station WTVI-TV's paired channel. That change was proposed to avoid significant predicted interference from operating Station WBTV-DT on Channel 23 at Charlotte, North Carolina. Through this supplement the Authority now proposes allotment of DTV Channel *11 as its paired channel.

2. As shown in the attached Amended Engineering Statement, the proposed substitution of DTV Channel *11 for DTV Channel *24 at Charlotte, North Carolina fully complies with applicable FCC rules and requirements. The Channel *11 allotment will provide almost exact service area replication with respect to the existing Channel *42 Grade B contour. Grant of the requested substitution of channels will afford improved

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and interference-free DTV service for Station WTVI-DT. Operation on the VHF channel will reduce some initial equipment costs, creating savings which will be used to finance other aspects of the DTV conversion, and will reduce operating expenses. These savings are highly desirable for this tax and viewer-supported public television station. As noted in the original Petition, the Authority has received a funding allocation for DTV conversion from Mecklenburg County, and it ready to proceed promptly upon amendment of the Table towards implementation of the proposal. Accordingly, favorable and early action by the FCC upon the petition for rule making, as supplemented, will serve the public interest.

The Authority therefore urges the FCC to issue a Notice of Proposed Rule Making to substitute DTV Channel *11 for DTV Channel *24 at Charlotte, North Carolina.

Respectfully submitted,

CHARLOTTE-MECKLENBURG PUBLIC
BROADCASTING AUTHORITY

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Date: May 19, 2000

AMENDED ENGINEERING EXHIBIT
IN SUPPORT OF PETITION FOR RULE MAKING
TELEVISION STATION WTVI(TV)
CHARLOTTE, NORTH CAROLINA

May 16, 2000

AMENDED ENGINEERING EXHIBIT
IN SUPPORT OF PETITION FOR RULE MAKING
TELEVISION STATION WTVI(TV)
CHARLOTTE, NORTH CAROLINA

Table of Contents

Engineering Statement

Figure 1	Summary of Allocation Analysis for Channel 11
Figure 2	Predicted Coverage Comparison

AMENDED ENGINEERING EXHIBIT
IN SUPPORT OF PETITION FOR RULE MAKING
TELEVISION STATION WTVI(TV)
CHARLOTTE, NORTH CAROLINA

Engineering Statement

This Amended Engineering Exhibit was prepared on behalf of television broadcast station WTVI(TV), Charlotte, North Carolina, in support of a petition for rule making. In its original petition, WTVI had proposed Channel 25 as its transitional DTV allotment channel. The purpose of this Amended Engineering Exhibit is to propose Channel 11 as WTVI's transitional DTV channel, instead of Channel 25.

The petitioner proposes that Channel 11 be allotted with an ERP 2 kW using a non-directional antenna with an antenna height above mean sea level of 590 m AMSL. This translates to an antenna height above average terrain (HAAT) of 387 m based on the use of the U.S.G.S. 3-second terrain database. The proposed geographic coordinates for the Channel 11 allotment would be the same as WTVI's Channel 24 allotment, which are the same as the licensed WTVI transmitter site coordinates.*

A detailed allocation study using an implementation of the FCC OET Bulletin No. 69 interference analysis procedure was prepared for the proposed Channel 11 allotment.[†] As detailed in Figure 1, the proposed Channel 11 allotment

* Coordinates: 35-17-14N / 80-41-45W based on NAD27.

[†] The duTreil, Lundin & Rackley, Inc. DTV interference analysis program is based on the program and procedures outlined by the FCC in the Sixth Report and Order; subsequent Memorandum Opinion and Order; and FCC OET Bulletin No. 69. A nominal grid size resolution of 1 km was employed. An Alpha based processor computer system was employed. The results have been found to be in very close agreement with the results of the FCC implementation of OET Bulletin No. 69.

meets the *de minimis* 2%/10% interference procedures outlined in the FCC's DTV Processing Guidelines[‡] that is applied in evaluating requests for modification of initial DTV allotments under Section 73.623(c)(2) of the FCC Rules. Also, the proposal is not in proximity to the Canadian or Mexican border areas.

The proposed Channel 11 allotment will alleviate a significant level of predicted interference from first-adjacent DTV facility WBTV-DT, Charlotte-NC, Channel 23. The WBTV-DT facility has been constructed and is operating with an ERP of 1000 kW. Predicted interference to the WTVI-DT Channel 24 allotment from the WBTV-DT allotment and the WBTV-DT actually operating facilities exceeds a population of 140,000 in either case. Furthermore much of this interference falls in the Charlotte metropolitan area. The Channel 11 allotment facilities will experience no predicted interference from WBTV-DT. Overall, the allotment of Channel 11 with the facilities as proposed herein will result in an improvement in predicted noise limited coverage for WTVI-DT of 231,000 people compared to the Channel 24 allotment; that despite a slightly lessened overall service area. A summary of the revised service area and population numbers as they would appear in the Appendix B of the FCC's *Sixth Report and Order* and subsequent *Second Memorandum Opinion and Order* are summarized below:

State and City	NTSC Channel	DTV Chan	DTV Power (kW)	Antenna HAAT (m)	DTV Service During Transition	
					Area (sq. km)	People (Thous)
NC CHARLOTTE	42	11	2.0	387.0 (590 m AMSL)	21162	1756

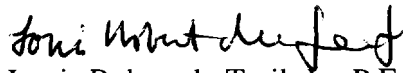
Figure 2 is a map showing the predicted coverage comparison between WTVI-TV Channel 42 Grade B coverage and that of WTVI-DT on Channel 11 as proposed herein.

[‡] See FCC *Public Notice*, "Additional Application Processing Guidelines for Digital Television (DTV)", Released: August 10, 1998.

As indicated in Figure 2, the proposed Channel 11 allotment provides nearly identical service area replication to the existing WTVI-TV Channel 42 facility Grade B contour.

With respect to possible Class A TV impact, a study was conducted according to the separation distances outlined in the FCC August-1998 Public Notice concerning DTV application processing. There were no LPTV or TV Translator facilities with Class A certification letters on file within these distances. Therefore, there is no adverse impact expected on any Class A TV stations.

It is evident from the above that the proposed Channel 11 allotment proposal would result in a preferential arrangement of FCC allotments.


Louis Robert du Treil, Jr., P.E.

May 16, 2000

AMENDED ENGINEERING EXHIBIT
IN SUPPORT OF PETITION FOR RULE MAKING
TELEVISION STATION WTVI(TV)
CHARLOTTE, NORTH CAROLINA

Summary of Allocation Analysis

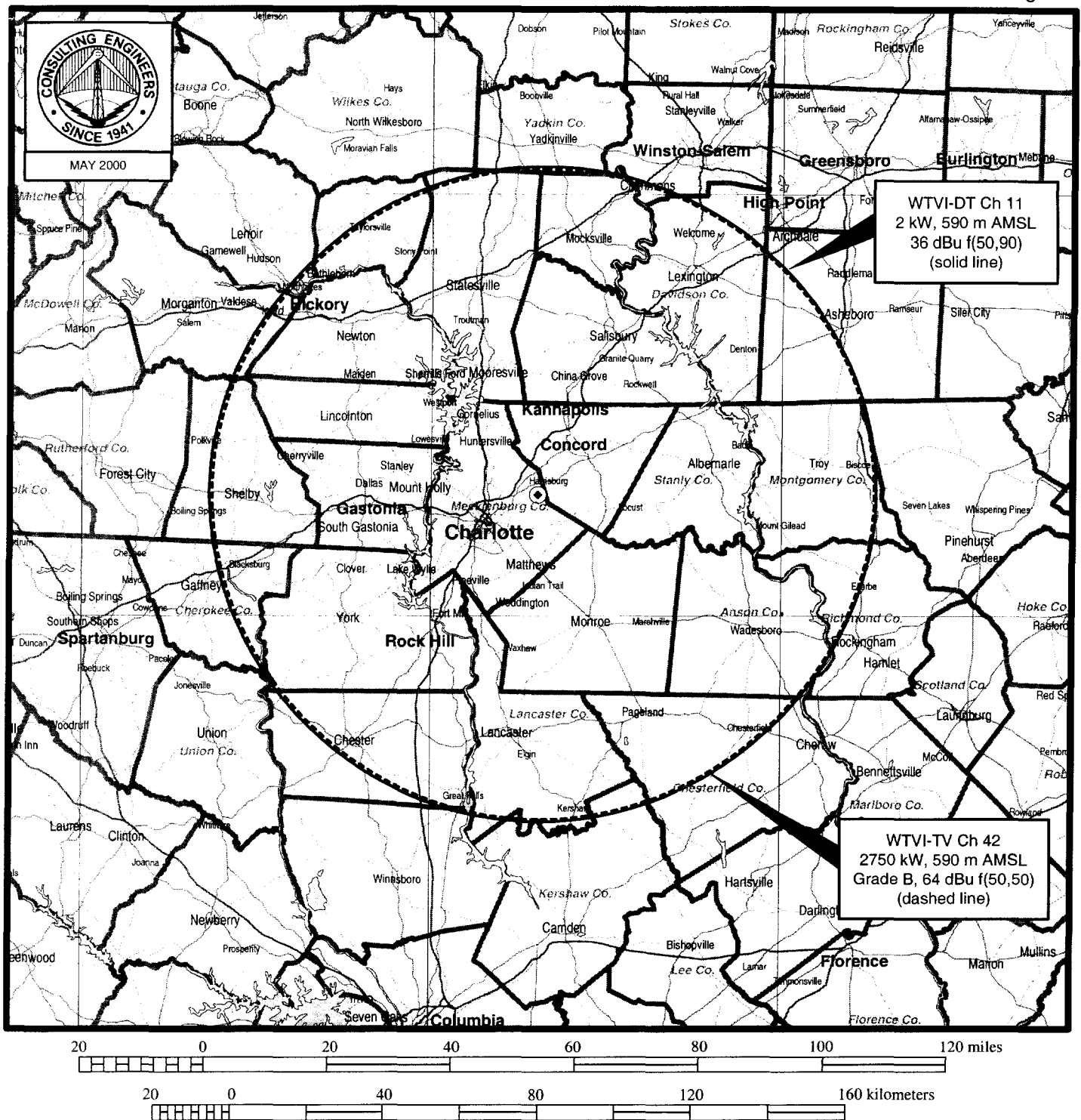
Facility	Ch.	TV or DTV?	Baseline Service Population (1990)	Permissible IX (%)	Total IX Caused by Proposed (1990)	Net New IX Caused by Proposed (1990)	Percent of Baseline (%)
Stations with total interference population caused equal to zero							
WSLS-TV, Roanoke-VA BLCT-990813LD	10	TV	--	--	--	0	0.00
WVPT-DT, Staunton-VA DTV Allotment	11	DTV	--	--	--	0	0.00
WTOG-TV, Savannah-GA BLCT-2311	11	TV	--	--	--	0	0.00
WVAH-TV, Charleston-WV BLCT-880421KF	11	TV	--	--	--	0	0.00
WXIA-TV, Atlanta-GA BMLCT-960208KF	11	TV	--	--	--	0	0.00
Stations with total interference population caused less than the 2%/10% <u>de minimis</u> requirement							
WIS, Columbia-SC BPCT-991120BB	10	TV	1,502,034	2.0	15,425	<=15,425	<=1.03
WIS, Columbia-SC BLCT-1421	10	TV	1,504,077	2.0	18,374	<=18,374	<=1.22
WJHL-TV, Johnson City-TN BLCT-2111	11	TV	1,784,479	2.0	8,392	<=8,392	<=0.47

Facility	Ch.	TV or DTV?	Baseline Service Population (1990)	Permissible IX (%)	Total IX Caused by Proposed (1990)	Net New IX Caused by Proposed (1990)	Percent of Baseline (%)
WXII, Winston-Salem-NC BLCT-2283	12	TV	2,672,581	2.0	45,237	<=45,237	<=1.69
Stations with total interference population caused greater than the 2%/10% <u>de minimis</u> requirement; but <u>net</u> interference population less than the 2%/10% <u>de minimis</u> requirement							
WTVD, Durham-NC BPCT-990901AG	11	TV	2,435,201	2.0	79,831	39,169 [§]	1.61
WTVD, Durham-NC BLCT-790816KI	11	TV	2,429,784	2.0	75,502	41,836 ^{**}	1.72

[§] This considers interference “masking” from the following: WVPT-DT (DTV Allotment); WJHL-TV; WCTI(TV); and WXII(TV).

^{**} This considers interference “masking” from the following: WVPT-DT (DTV Allotment); WJHL-TV; WCTI(TV); and WXII(TV).

Figure 2



PREDICTED COVERAGE COMPARISON

du Treil, Lundin & Rackley, Inc. Sarasota, Florida